CORRES CONTROL

0977 RF 94

DUE DATE

**ACTION** 

BERMAN, H S

HANNI, BJ

HEALY, TJ HEDAHL TG

HILBIG J G

HUTCHINS N M

KIRBY WA

MAHAFFEY JW MANN HP

MCKENNA F G MORGAN R V

PIZZUTO V M

SCHUBERT AL SETLOCK GH STIGER SG

SULLIVAN M

WILSON J M

Bush

O'neill

SWANSON, E R WILKINSON R B

O'Rourte

POTTER G L SANDLIN N B SATTERWHITE D G

MARX GE

CARNIVAL, G J COPP, R D CORDOVA, R.C. DAVIS, J G FERRERA, D W FRANZ, W A

DIST



LTR ENC

## Department of Energy

ROCKY FLATS OFFICE P O BOX 928 GOLDEN COLORADO 80402 0928



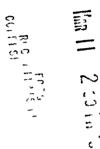
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94-DOE-02372

Mr Martin Hestmark U S Environmental Protection Agency, Region VIII ATTN Rocky Flats Project Manager, 8HWM-RI 999 18th Street, Suite 500, 8WM-C Denver, Colorado 80202-2405

Mr Gary Baughman
Hazardous Waste Facilities Unit Leader
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530



#### Gentlemen

Over the past several months, staff members from the Department of Energy (DOE), the Environmental Protection Agency, and the Colorado Department of Health have discussed methods to reduce costs and speed up the environmental cleanup at the Rocky Flats Plant During these discussions, it was decided, in principle, to rescope the original schedules for Operable Units (OUs) 7 and 11, beginning with the Phase I Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation (RFI/RI) Work Plans As pair of this rescoping, the original Phase I Work Plans for both OU-7 and 11 will be modified and several of the Table VI Milestones listed in the Interagency Agreement will be deleted or replaced by technical memorandums In addition, we propose the transfer of Individual Hazardous Substance Sites 166 1, 166 2, 166 3, and 167 1 from OU-6 to OU-7

The enclosure contains highlights of the proposed changes and new schedules Your review, comments, and formal approval of the revised scopes of these OUs are requested

The DOE would like to acknowledge the efforts of all parties in developing this rescoping strategy, a strategy that streamlines our regulatory and technical process to promote cleanup rather than paperwork. We look forward to continued cooperative efforts and the improvement of the overall performance of our environmental restoration effort.

CORRES CONTROL	х	х
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Reviewed for Addressee Corres Control RFP

3-//-94 C.

Ref Ltr #

DOE ORDER # 5400 1

If you have any specific questions concerning the rescoping effort, please direct them to Jen Pepe at 966-2184, or Dave George at 966-5669

Sincerely,

Van Wicherell

Jessie Roberson Acting Assistant Manager for Environmental Restoration

Enclosure

cc w/Enclosure F Lockhart, ER, RFO S Stiger, AGMERM D George, ER, RFO T O'Rouike, EG&G W Busby, EG&G K O'Neill, EG&G

## OPERABLE UNIT 11 PROPOSED RESCOPED ACTIVITIES

The following original IAG milestones were delivered as scheduled

SUBMIT DRAFT PHASE I RFI/RI WORK PLAN SUBMIT FINAL PHASE I RFI/RI WORK PLAN JUNE 8, 1990 JANUARY 2, 1992

The milestone SUBMIT DRAFT PHASE I RFI/RI REPORT has been increased in scope. The original milestone was scheduled for delivery on September 20, 1994. With the change in scope, the target date for completion is scheduled for at or near September 20, 1994.

Phase I and Phase II are proposed to be combined to a single phase to reduce the duration of closure

The milestone SUBMIT DRAFT PHASE I PROPOSED IMIRA DECISION DOCUMENT is assumed to include a Justification for No Further Action

All of the milestones following are assumed to be deleted per the Justification for No Further Action.

# OPERABLE UNIT 11 IAG TABLE VI MILESTONES PROPOSED TO BE REVISED OR DELETED

MILESTONE SUBMIT DRAFT PHASE I REVRI REPORT SUBMIT FINAL PHASE I REVRI REPORT	POTENTIAL DISPOSITION Revised* Revised*
SUBMIT DRAFT PHASE I PROPOSED IMIRA DD SUBMIT FINAL PHASE I PROPOSED IMIRA DD SUBMIT PHASE I IMIRA RESPONSIVENESS SUMMARY SUBMIT PHASE I FINAL IMIRA DECISION DOCUMENT AND FINAL RESPONSIVENESS SUMMARY	
SUBMIT IM DESIGN CD/RD WORK PLAN SUBMIT PHASE I IMIRA IMPLEMENTATION DOCUMENT	Deleted** Deleted**
SUBMIT TITLE II DESIGN BEGIN PHASE I IMIRA CONSTRUCTION	Deleted** Deleted**
SUBMIT DRAFT PHASE II RFI/RI WORK PLAN SUBMIT FINAL PHASE II RFI/RI WORK PLAN SUBMIT DRAFT PHASE II RFI/RI REPORT SUBMIT FINAL PHASE II RFI/RI REPORT	Deleted* Deleted* Deleted* Deleted*
SUBMIT DRAFT PHASE II CMS/FS REPORT SUBMIT FINAL PHASE II CMS/FS REPORT	Deleted* Deleted*
SUBMIT DRAFT PHASE II PP SUBMIT FINAL PHASE II PP SUBMIT DRAFT PHASE II RESPONSIVENESS SUMMARY SUBMIT FINAL PHASE II RESPONSIVENESS SUMMARY	Deleted* Deleted* Deleted* Deleted*
SUBMIT DRAFT PHASE II CAD/FAD SUBMIT FINAL PHASE II CAD/FAD	Revised** Revised**
SUBMIT CD/RD WORK PLAN SUBMIT DRAFT TITLE II DESIGN PLANS SUBMIT FINAL TITLE II DESIGN PLANS	Revised** Revised** Revised**
BEGIN PHASE II CA/RA CONSTRUCTION	Revised**

<sup>\*</sup>Integration of Phase I & Phase II Requirements

<sup>\*\*</sup> Assuming No Further Action Justification Per Integrated Phases RFI/RI Results

## OPERABLE UNIT 7 PROPOSED RESCOPED ACTIVITIES

The following original IAG milestones were delivered as scheduled.

SUBMIT DRAFT PHASE I RFI/RI WORK PLAN SUBMIT FINAL PHASE I RFI/RI WORK PLAN JUNE 8, 1990 AUGUST 26, 1991

The following milestone was delayed due to a Stop Work Order

SUBMIT DRAFT PHASE I REVRI REPORT

OCTOBER 12, 1993

The remedial action necessary to close Operable Unit 7 is guided by the CHWA. In following the guidance of the CHWA, some previously planned activities can be eliminated. Therefore, several milestones are proposed to be revised or deleted.

The Phase II RFI/RI will be included within the IM/IRA document. This action will delete all Phase II RFI/RI milestones. An extension will be required for the IM/IRA DD due to its increased scope. The following IM/IRA DD proposed revised milestones are as follows.

### Milestone

SUBMIT IMIRA DECISION DOCUMENT AGENCY APPROVAL IMIRA DD IMIRA DD APPROVED

In addition, several milestones beyond the Phase II RFI/RI are proposed to be modified as a result of the IM/IRA DD

### Milestone

IM DESIGN WORK PLAN COMPLETE
SUBMIT DRAFT PHASE I IMIRA IMPLEMENTATION DOCUMENT
SUBMIT TITLE II DESIGN
BEGIN CONSTRUCTION PROCESS

# OPERABLE UNIT 7 IAG TABLE VI MILESTONES PROPOSED TO BE REVISED OR DELETED

MILESTONE SUBMIT DRAFT PHASE I REVRI REPORT SUBMIT FINAL PHASE I REVRI REPORT	POTENTIAL DISPOSITION Deleted* Deleted*
SUBMIT DRAFT PHASE I IMIRA DD SUBMIT FINAL PHASE I IMIRA DD SUBMIT IMIRA RESPONSIVENESS SUMMARY SUBMIT FINAL PHASE I IMIRA DD SUBMIT IM/DESIGN WORK PLAN SUBMIT PHASE I IMIRA IMPLEMENTATION DOCUMENT SUBMIT TITLE II DESIGN BEGIN PHASE I IMIRA CONSTRUCTION	Revised*** Revised*** Revised*** Revised*** Revised*** Revised*** Revised*** Revised***
SUBMIT DRAFT PHASE II RFI/RI WORK PLAN SUBMIT FINAL PHASE II RFI/RI WORK PLAN SUBMIT DRAFT PHASE RFI/RI REPORT SUBMIT FINAL PHASE RFI/RI REPORT	Deleted** Deleted** Deleted** Deleted**
SUBMIT DRAFT PHASE II CMS/FS REPORT SUBMIT FINAL PHASE II CMS/FS REPORT	Deleted** Deleted**
SUBMIT DRAFT PHASE II PP SUBMIT FINAL PHASE II PP SUBMIT DRAFT PHASE II RESPONSIVENESS SUMMARY SUBMIT FINAL PHASE II RESPONSIVENESS SUMMARY	Deleted Deleted Deleted Deleted
SUBMIT DRAFT PHASE II CAD/FAD SUBMIT FINAL PHASE II CAD/FAD	Revised*** Revised***
SUBMIT CD/RD WORK PLAN SUBMIT DRAFT TITLE II DESIGN SUBMIT TITLE II DESIGN	Deleted Deleted Deleted
BEGIN CARA CONSTRUCTION	Deleted***

<sup>\*</sup>Phase I requirement satisfied in revised FSP Tech Memo

<sup>\*\*</sup>Integration of Phase I & Phase II requirements
\*\*\* Final Action will be significantly streamlined due to IM/IRA accomplishing closure
\*\*\*Revised to incorporate Phase II RFI/RI Report requirements

ACTIVITY	101	ORIG	EARLY	EARLY	
RIPTION	FLT	DUR	START	FINISH	1 1994 1 1995 1 1005
NEPA DOCUMENTATION ACTIVITIES	58	36	10CT93A	25FEB94	
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INCORPORATE EPA/COH COMMENTS AND REVISE FSP TM	0	σ	25MAR94	7APR94	
REVISED FIELD SAMPLING PLAN APPROVED	0	0	8APR94	7APR94	<b>\rightarrow</b>
OU 11 RFI/RI SUBCONTPACT PROCUREMENT		90	10CT93A	28JAN94A	
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RAD SURVEY	0	5	8APR94	14APR94	
OU 11 COMBINED PHASES FIELDWORK	0	40	15APR94	10JUN94	
COMPLETE OU 11 COMBINED PHASES FIELDWORK	615	0		10JUN94	<
PREPARE DRAFT RFI/RI REPORT	0	154	5AUG94	21MAR95	
OU 11 LAB ANALYSIS	0	9	15APR94	6SEP94	
ENVIRONMENTAL EVALUATION	112	40	9AUC94	40CT94	
PREPARE IM #1( EXPOSURE SCENERIO)	170	21	28JAN94A	10MAR94	•
SUBMIT DRAFT TM #1 TO DOE	170	0		10MAR94	
EGRG REVIEW TM #1	181	15	11MARa4	31MAR94	
DOE REVIEW TM #1	170	36	11MAR04	18APP94	
REVISE TM #1	170	10	1 9APR94	2MAY94	
SUBMIT DRAFT TM #1 TO EPA/CDH	170	0	1	2MAY94	<
AGENCY REVIEW TM #1	170	ଯ	3MAY94	31MAY94	
PREPARE RESPONSE SUMMARY IM #1	170	10	1 JUN94	14JUN94	
FINAL REVISION TM #1	170	5	8JUN94	21 JUN94	
SUBMIT FINAL TM #1 TO EPA/CDH	170	0		21 JUN94	<
PREPARE TM #2 (MODELING)	162	2	18FEB04A	22MAR94	
SUBMIT DRAFT TM #2 TO DDE	162	0		22MAR94	.◊.
EGEG REVIEW TM #2	173	15	23MAR94	13APR94	
DOE REVIEW TM #2	162	26	23MAR94	28APR94	
REVISE TM #2	162	5	29APR94	12MAY94	
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EGRLY FINISH	12MAY94	10JUN94	24 JUN94	1JUL94	1 JUL 94	20SE594	205EP94	11DCT94	260CT94	PN0V94	4PV0NP	4DEC44	23DEC94	9JAN95	9JAN95	190CT94	190CT94	9NDV94	28NDV94	12DEC94	120EC94	17JAN95	31 JAN95	7FEB45	7FEB45	28FEB45	21MAR95	21MAR95	20APR95	19MAY95	19MAY95	Sheet 2 of 3	LD	
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ACTIVITY DESCRIPTION	SUBMIT DPAFT IM #2 TO EPA/CDH	AGENCY REVIEW TM #2	PREPARE RESPONSE SUMMARY TM #2	FINAL REVISION TM *2	SUBMIT FINAL TM #2 TD EP9/CDH	PREPAPE DRAFT TM #3	SUBMIT DRAFT TM #3 TO DDE	EGRG REVIEW TM #3	DOE REVIEW TM #3	REVISE TM #3	SUBMIT DRAFI TM #3 TO EPA/CDH	AGENCY REVIEW TM #3	PREPARE RESPONSE SUMMARY TM #3	FINAL REVISION TM #3	SUBMIT FINAL TM #3 TO EPA/CDH	PREPARE DRAFT TM #4 (TOXICITY)	SUBMIT DRAFT TM #4 TO DOE	EGEG REVIEW TM #4	DOE REVIEW TM #4	E TM #4	T DRAFT TM #4 TO EPA/CDH	AGENCY REVIEW TM #4	PREPARE RESPONSE SUMMARY TM #4	REVISION TM #4	SUBMIT FINAL TM #4 TO EPA/CDH	CONDUCT HHRA	BASELINE RISK ASSESSMENT	SUBMIT DRAFT RFI/RI REPORT TO DOE	REVIEW DRAFT RF1/RI REPORT	E DRAFT RFI/RI REPORT	RFI/RI REPORT TO EPA/CDH	Activity Bar/Early Dates Outi	<u>}</u>	2
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1251094370 AGENCY REVIEW DRAFT RFI/RI REPORT		2	22MAY95	SOJUNGS	-
1251094375 REVISE DRAFT RFI/RI REPORT	0	2	21 JUN95	20JUL 05	
- 1	0	0	21 JUL 95	20JUL95	<b>*</b>
1251094385 EPA/CDH REVIEW RFI/RI FOR FINAL APPROVAL	0	10	21 JUL 95	390695	
1251094387 RFI/RI REPORT APPROVED	0	0	490695	340045	<b>*</b>
- 1	0	42	490095	300195	
1251094400 SUBMIT DRAFT ND FURTHER ACTION JUSTIFICATION TO	0	0	40CT95	300.195	<b>*</b>
125104410 DOE REVIEW DRAFT NFAJD	0	15	40CT95	1100095	
125104420 REVISE DRAFT NFAJD	0	15	2NDV95	4DEC95	, =
125104430 SUBMIT DRAFT NFAJD TO EPA/CDH	0	0	SDEC45	4DEC95	. •
1251094440 EPA/CDH REVIEW NFAJO	o	62	50EC45	7M9R96	. [
1251094450 REVISE NFAJD	0	4.1	8MAR96	6M9Y96	
1251094460 SUBMIT FINAL NFAJO TO EPA/CDH	0	0	7MAY96	6M9Y96	•
1251094470 EPA/CDH REVIEW AND APPROVE NFAJD	0	21	2MAY96	5,000	
1251094480 NO FUTHER ACTION JUSTIFICATION APPROVED	0	0	6JUN06	55UNG6	. \$
1251094490 PUBLIC COMMENT PERIOD	0	58	62VV96	27AUG96	
1251044500 PUBLIC COMMENT RESOLUTION	0	21	2890696	265EP96	
1251094510 PREPARE RECORD OF DECISION	0	4 C1	27SEP96	25NDV96	, C
1251094520 RECORD OF DECISION ISSUED	0	0	26NDV96	25N0V96	•
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	37	21 JAN94A	19aPR94	<b>-</b>
	32	21 JAN94A	12APR94	<b>□</b> -
	5	13APR04	19APR94	
	3	28JAN94A	1MGR94	<b>013-</b>
	40	11FE894A	22APR94	<b>Q</b> _
	0	25APR94	22pPR94	<b>♦</b>
	10	25GPP94	6M9Y94	4
MMENTS	10	9MAY94	20M9Y94	·
EPA/CDH		23MGY94	20M9Y94	<b>\$</b>
	15	23MAY 04	13JUN94	
EPA/CDH COMMENTS	01	14JUN94	27 JUN94	• • • • • • • • • • • • • • • • • • •
	0	28JUN94	27 JUN94	<b>~</b>
	21	23JAN94A	25MAP94	<b>-</b>
	9	14JUN94	21 JUN94	-
	121	28MGR94	26APR94	
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	0	630194	510194	<b>♦</b>
	9	6301.94	285EP94	
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	23	27 JUL 94	24AUG94	
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	10	155EP94	285EP94	<b>~</b>
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/ITY PIINN		Je.	HOT SAMPLE ANALYSIS	COLD SAMPLE ANALYSIS	DATA VALIDATION	BASELINE RISK ASSESSMENT	SSMENT	ELP AREA SOILS ASSESSMENT	OU 7 GROUNDWATER ASSESSMENT	OUTYEAR PLANNING DOCUMENT	IM/IRA DECISION DOCUMENT	ARARS DEVELDOMENT	REGULATORY SUPPORT	MODELING SUPPORT	CONCEPTUAL DESIGN	LUATION	ENVIRONMENTAL ASSESSMENT(E9)	TECHNOLOGY LITERATURE RESEARCH	ANALYSIS	IM/IRA DRAFT DECISION DOCUMEN	SUBMIT DRAFT IM/IRA DECISION DOC TO DOE	RFD/HQ REVIEW DRAFT IM/IRA DECISION	IM/IRA DECISION DOC PER	DRAFT IM/IRA DECISION DOCUMENT	CDHZEPA REVIEW DRAFT IMZIRA DECISION	IM/IRA DECISION DOC PER EPA/COH COMMENTS	FINAL IM/IRA DECISION DOC TO CO	PUBLIC RESPONSIVENESS SUMMARY	IM/IRA RESPONSIVENESS SUMMARY	OD COMMENT RESOLUTION/REVISION			Activity Bar/Early Dates Critical Activity Propers Bar C/F
ACTIVITY DESCRIPTION	2000	ANALYTICAL	HOT SAMP	COLD SAM	DATA VA	BASEL INE	PLF ASSESSMENT	ELP AREA	00 7 GRO	DUTYEAR	IM/ IRA D	ARARS DE	REGULATO	MODELING	CONCEPTU	DATA EVALUATION	ENVIRONM	TECHNOLO	OPTIONS	PREPARE	SUBMIT D	DOE RFO/	REVISE DRAFT	SUBMIT DRAFT	CDH/EPA	REVISE I	SUBMIT F	IM/IRA D	SUBMIT I	IM/IRA DD	ation SUMMARY		255 EB 4 10 CT 41
ACTIVITY ID		1230200260	1230200270	1230200280	1230200290	1230200300	1230200310	1230200320	1230200330	1230200340	1230200350	1230200360	1230200370	1230200380	1230200390	1230200400	1230200410	1230200420	1230200430	1230200440	1230200445	1230200450	1230200455	1230200460	1230200470	1230200475	1230200480	1230200490	1230200495	1230200500	Activity Classification SUMMARY		Plot Date 25FEB44 Project Start 10CT91

ACTIVITY ID	ACTIVITY DESCPIPTION	REM	EARLY START	EARLY FINISH	8047 - 7794   FY95   FY94   FY94   FY94   FY94   FY94   FY95   FY
1230200510	IM/IRA DD FINAL EPA/CDH/DOE REVIEW	42	6DEC95	9FEB46	
1230200520	SUBMIT FINAL IM/IRA DD AND RESPONSIVENESS SL	SUMM 0	12FEB96	oFEB96	• • • • • • • • • • • • • • • • • • •
1230200530	REMEDIAL DESIGN	347	4M9Y95	3DEC96	
1230200540	IM/DESIGN WORKPLAN	42	4MAY05	330145	0
1230200545	SUBMIT IM/DESIGN WORKPLAN TO DOE	0	5701.95	330195	<b>♦</b>
1230200550	DOE RFO/HQ REVIEW IM WORKPLAN	15	570165	25 JUL 95	
1230200555	REVISE IM WORKPLAN PER DOE COMMENTS	10	26 JUL 95	BAUG95	
1230200558	SUBMIT IM DESIGN WORKPLAN TO COH/EPA	0	990695	890695	<b>*</b>
1230200560	CDH/EPA REVIEW IM WORKPLAN	15	990695	2990695	
1230200565	REVISE IM WORKPLAN PER EPA/COH COMMENTS	ស	3090695	6SEP45	
1230200570	IM DESIGN WORKPLAN COMPLETE	0	75EP45	65EPo5	<b>*</b>
1230200580	PHOSE I IM/IRA IMPLEMENTATION DOCIDRAT TTL	11, 100	75EP95	SFEB46	0
1230200585	SUBMIT PHASE I IM/IRA IMP DOC TO DOE	0	6FEB96	5FE896	<b>*</b>
1230200590	DOE RFO/HO REVIEW IM/IRA IMPLEMENTATION DOC	<u>ب</u>	6FEB96	5MAR96	
1230200595	REVISE IM/IRA IMP DOC PER DOE COMMENTS	21	<b>6MAR96</b>	4APR96	
1230200500	SUBMIT DRAFT PHASE I IM/IRA IMP DOC TO CDH/EPA	PA 0	5APR95	44PP46	<b>♦</b>
1230200610	COHZEPA REVIEW DRAFT IMZIRA IMP DOC	42	5ePR96	4 JUN96	0
1230200620	REVISE IM/IRA IMPLEMENTATION DOCUMENT	63	5JUN96	3SEPa6	
1230200630	SUBMIT TITLE II DESIGN TO CDH/EPA	0	45EP96	35EP96	*
1230200640	CDH/EPA REVIEW/REVISION CYCLE	42	45EP96	3100196	
1230200650	FINAL TITLE II DESIGN W/CONSTRUCTION SCHEDULE	21	1NDV96	3DEC96	. 0
					CONSTRUCTION
1232000560	BECIN IM/IRA CONSTRUCTION PROCESS	0	6MAR95	5MAR96	• • • • • • • • • • • • • • • • • • •
1232000670	DAVIS BACON DETERMINATION	ហ	6MAR96	12MAR96	
1232000580	DAVIS-BACON APPROVAL	0	13MAP96	12MAR96	• • • • • • • • • • • • • • • • • • •
1232000690	CONTRACT DEFINITION/ADVANCE NOTICE	9	13MAR96	96NUC9	
1232000700	SUBCONTRACT BOILER PLATER PROCUREMENT )	10	27JUN96	20JUN96	
1232000710	SUBCONTRACT DIVISION	10	21 JUN96	530196	
1232000720	IWCP DRAFTEFS DRAFT TITLE II DESIGN 3	10	971118	1930196	
Activity Classification	SUPPRINCE				
'''''	Plot Date 2HAR94 Critical Activity Bar/Early Dates Data Date 25FE894 Critical Activity Project Start 10071 Critical Activity Project Start 10071	EG&G	ROCKY	FLATS Sweet	11 3 of 4 Bare Revision Checked Approved
<u> </u>		ADS 1255 / 0	OU 7 PRES	PRESENT LANDFILL	11.1
ra Sv	(c) Primavera Systems Inc				

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ACTIVITY ACTIVITY ID DESCRIPTION	1	1232000730 ISSUE RFP	PRE-B	1232000750 BID PROPOSAL RECIEVED	1232000760 BID PROPOSAL TECHNICAL REVIEW	1232000770 SUBCONTRACT AWARD	1232000780 NOTICE TO PROCEED	1232000790 RECEIVE SUBMITTALS	1232000800 APPROVE SUBMITTALS	1232000810 FINALIZE IMCP	1232000820 SUBCONTRACTOR TRAINING	1232000830 SUBCONTRACTOR MOBILIZATION	1232000840 CONSTRUCTION	1232000850 POST CONSTRUCTION .		1230400000 POST CLOSURE PERFURMANCE MONITORNG		1231109400 PROJECT SUPPORT & ADMINISTRATION	1231109500 PROJECT SUPPORT & ADMINISTRATION	SUPPORT &	1231109700 PROJECT SUPPORT & ADMINISTRATION	1231109800 PROJECT SUPPORT & ADMINISTRATION	1231109900 PROJECT SUPPORT & ADMINISTRATION	1231129000 PROJECT SUPPORT & ADMINISTRATION	•	<b>ле</b> ня?	Plot Date 2MAR94 Critical Berlealy Dates Out 25FE894 Critical Activity Project Finish 16FE801 Over Critical Activity Over Critical Activi	(C.) Primavera Systems Inc	

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